

AFFIDAVIT IN SUPPORT OF APPLICATION FOR CRIMINAL COMPLAINT

INTRODUCTION

I, Tucker J. Heap, having been first duly sworn, do hereby depose and state as follows:

1. I have been employed as a Special Agent of the Federal Bureau of Investigation ("FBI") for approximately nine years and am currently assigned to the Boston Division, Child Exploitation Task Force. While employed by the FBI, I have investigated federal criminal violations related to, among other things, the on-line sexual exploitation of children. I have received training in the area of child pornography and child exploitation, and have had the opportunity to observe and review numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media including computer media.
2. I submit this affidavit in support of a criminal complaint charging Thomas LeBlanc, YOB: 1986, of Lynn, Massachusetts, with receipt and possession of child pornography, in violation of 18 U.S.C. § 2252A(a)(2)(B) and 2252(a)(5)(B).
3. The statements contained in this affidavit are based in part on information provided by FBI Special Agents; written reports about this and other investigations that I have received, directly or indirectly, from other law enforcement agents, information gathered from the service of administrative subpoenas; the results of physical and electronic surveillance conducted by law enforcement agents; independent investigation and analysis by FBI agents/analysts and computer forensic professionals; and my experience, training and background as a Special Agent with the FBI. Because this affidavit is submitted for the limited purpose of securing authorization for the requested search warrant, I have not included each and every fact known to me concerning this investigation. Instead, I have set forth only the facts that I believe are necessary to establish the necessary foundation for the requested criminal complaint.

4. On July 23, 2015, in the District of Massachusetts, United States Magistrate Judge Robert B. Collings issued a search warrant for the address of LeBlanc's residence in Lynn, Massachusetts. The search warrant was obtained based on information that led investigators to believe that someone at that address using the screen name "Dumbledore" had accessed files from a website known to contain child pornography. Specifically, on February 28, 2015, "Dumbledore" accessed a file entitled "12 yo cutie pops out her swollen clit! (in HD)." The thread contained a file titled "12 yo cutie pops out her swollen clit.mp4" that contained 24 images of what appeared to be a prepubescent female. In the majority of the images, the prepubescent female's exposed genitals are the focal point of the image.

5. On July 24, 2015, the Federal Bureau of Investigation Boston Child Exploitation Task Force and the Lynn Police Department executed the federal search warrant. Upon entering the residence, the agents and officers encountered the following three individuals: Thomas LeBlanc, his mother ("Charlene"), and father ("David"). Agents interviewed all three. Thomas LeBlanc stated he utilized the username "Dumbledore" to access a website, known to law enforcement as containing child pornography. Thomas identified a Toshiba laptop computer, serial number 53024331VU, in his bedroom that he used to access the website. Thomas stated he viewed the images of child pornography, masturbated to them, but did not download the images.

6. Thomas' mother, Charlene, stated she had purchased the Toshiba laptop, but later gave it to Thomas to use. Charlene stated Thomas had exclusive use of the laptop since 2010. Thomas also stated he was the only individual who utilized the laptop. A preliminary forensic review of the Toshiba laptop showed the device contained the following video files:

- a. "newlipsspreadopen.3gp" and

b. "girlnicetime.flv"

7. "newlipsspreadopen.3gp" is a video depicting an adult male engaged in vaginal sex with a prepubescent female. The preliminary forensic reviewed listed the video file was saved to the Toshiba laptop on November 13, 2014. "girlnicetime.flv." is a video depicting a prepubescent female performing oral sex on an adult male. The preliminary forensic reviewed listed the video file was saved to the Toshiba laptop on October 27, 2014.

8. The preliminary forensic review also showed the Toshiba laptop contained the following images:

a. "jirxljnkoxebemahgp2rpg--_m.jpg"

b. "pn7u7gjjuxew.obv29qrs--_m.jpg"

c. "xrcbgzwidhgwwlbkpyfyfw--_m.jpg"

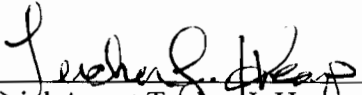
9. "jirxljnkoxebemahgp2rpg--_m.jpg" depicts a naked adult male holding a prepubescent female in his lap. The prepubescent female is only wearing fishnet stockings and a garter belt. Her vagina is exposed next to the adult male's erected penis. "pn7u7gjjuxew.obv29qrs--_m.jpg" depicts an adult male rubbing the tip of his penis against the bare vagina of a prepubescent female. The two are laying side by side on what appears to be a bed. "xrcbgzwidhgwwlbkpyfyfw--_m.jpg" depicts a naked prepubescent female laying on her back. The photograph also depicts a hand holding the erected penis of an adult male up against the bare vagina of the prepubescent female. The preliminary forensic reviewed listed all three images were saved to the Toshiba laptop on June 25, 2014.

10. Due to my training and experience, I believe the two video files and the three images are child pornography.

11. Charlene stated three girls, ages 10, 9 and 3 years old, had lived at the residence for a number of years until they moved to Florida in 2013. Agents questioned Thomas regarding his relationship with the three girls. Thomas stated some of the girls may have accidentally touched his penis on a few occasions. Thomas also stated he masturbated while the two oldest girls were asleep in his car on one occasion.

Conclusion

12. Based on the foregoing, there is probable cause to believe that Thomas LeBlanc received and possessed child pornography.



Special Agent Tucker J. Heap
Federal Bureau of Investigation

Sworn and subscribed to before me this 24rd day of July, 2015.



ROBERT B. COLLINGS
United States Magistrate Judge